

DEPOSITION OF ROBERT A. WHITE, JR.
 CONDUCTED ON TUESDAY, FEBRUARY 14, 2012

31 (Pages 121 to 124)

<p style="text-align: right;">121</p> <p>1 of the job conditions, how do you think those killed 2 Mr. Halferty? 3 MR. GARLAND: Objection. 4 A The job site, if the conditions would have 5 been the way they were supposed to, I could have used 6 the forks, picked the beam up, set it up there and set 7 it on there. But it wasn't, so I used the strap to 8 jockey the beam in, to get it up there into place. 9 BY MR. MAHAFFEY: 10 Q So do you think the job conditions caused 11 the strap to break? 12 A Overall, yeah, because the strap wouldn't 13 have been used if it wouldn't have been for the job 14 conditions. 15 Q What else would you have used? 16 A The forks. 17 Q You would have used the forklift? 18 A Yeah, used the forklift, the forks on the 19 forklift to set it up there. 20 Q Why do you think the strap failed? 21 A I have no idea. 22 Q Do you think if you'd used another strap</p>	<p style="text-align: right;">123</p> <p>1 Q So the reason that you don't use new straps 2 all the time is because you want to save money? 3 MR. BURGOYNE: Objection. 4 A The reason is it's not a call to use a new 5 strap every time. 6 BY MR. MAHAFFEY: 7 Q Because it's too expensive? 8 A There's no call for it. If the strap is 9 good, why would you buy a new one? Why would you buy 10 a new phone if your phone still worked? 11 Q Do you think you should have used padding on 12 this job site? 13 A From what I understand now, yeah, it might 14 have helped. 15 Q Okay. Who do you think was the last person 16 who could have prevented the accident? 17 A Me. 18 Q Did the death of Mr. Halferty have an impact 19 on the overall job in terms of stopping it? 20 A I -- honestly, I don't know why it would 21 have, but I was not going to go -- continue on with 22 it.</p>
<p style="text-align: right;">122</p> <p>1 that Mr. Halferty wouldn't have died? 2 A I honestly have no idea. 3 Q What's your guess? 4 MR. BURGOYNE: Objection. 5 A I've used straps many times over many years, 6 and that's the first time I had one break. 7 BY MR. MAHAFFEY: 8 Q Do you think you should have had a new one, 9 brand-new one? 10 A That was almost new. 11 Q Well, you said that you'd used it before. 12 A Yeah, but it was almost new. I mean, you 13 can't -- you can't go out and buy a strap for every 14 job you do. The job, it just don't pay enough, it's 15 not -- I don't know what you call it. 16 Q But isn't a strap only 60 bucks? 17 A No, it should -- if you buy one every job, 18 everything leads up. There ain't no money building 19 canopies anymore. That's one reason I'm not doing it, 20 too. 21 Q Because you're not making enough money? 22 A You're not making money.</p>	<p style="text-align: right;">124</p> <p>1 Q Okay. So that would necessitate getting 2 somebody else to do your job, right? 3 A Yes. 4 Q Okay. So then after, when Mr. Halferty 5 died, did there come a point where you gave a 6 statement to anybody about what happened? 7 A I'm sure I did. 8 Q Do you remember? 9 A No. 10 Q Okay. Do you remember talking to the Navy 11 people? 12 A I know I did. And I talked to the police 13 and talked to OSHA, but I don't remember what I said, 14 or what they were asking, or -- 15 Q Okay. Do you remember when you talked to 16 the Navy? 17 A I know that day or that night I talked to a 18 couple different people. Then the next day I talked 19 to some other ones. 20 Q Who did you talk to the next day? 21 A Like I said, I don't -- it might have been 22 the Navy the next day. OSHA was the next day.</p>